

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DAVITA M. KEY,

Plaintiff,

v.

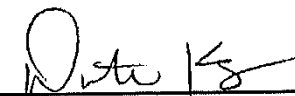
HYUNDAI MOTOR
MANUFACTURING, ALABAMA,
LLC; HYUNDAI ENG AMERICA,
INC.; and DYNAMIC SECURITY,
INC.

Defendants.

Case No. 2:19-CV-767-ECM

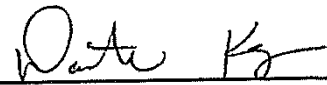
PLAINTIFF'S MAY USE EXHIBIT 15

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION <small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small>		Charge Presented To: Agency(ies) Charge No(s): <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC 846-2017-32787	
_____ and EEOC <small>State or local Agency, if any</small>			
Name (Indicate Mr., Ms., Mrs.) Davita M. Key		Home Phone (Incl. Area Code) [REDACTED]	Date of Birth [REDACTED]
Street Address [REDACTED]		City, State and ZIP Code [REDACTED]	
Named Is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name DYNAMIC SECURITY INCORPORATED		No. Employees, Members 500 or More	Phone No. (Include Area Code) (334) 395-7722
Street Address 5510 Wares Ferry Road, Suite S, Montgomery, AL 36117		City, State and ZIP Code Montgomery, AL 36117	
Name _____		No. Employees, Members _____	Phone No. (Include Area Code) _____
Street Address _____		City, State and ZIP Code _____	
DISCRIMINATION BASED ON (Check appropriate box(es).) <input checked="" type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify) _____		DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest 07-21-2017 08-01-2017 <input type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)). <p>My race is Black. I am a pregnant female. I was hired by the above-named employer on July 21, 2017, as a mail clerk assigned to the Hyundai Plant. I was interviewed on July 19, 2017, by Gloria Robinson and Maurice (last name unknown). On July 27, 2017, I participated in the required training and completed safety training at Hyundai.</p> <p>On July 31, 2017, I informed Supervisor Maurice, in the presence of Ms. Robinson, of my pregnancy and presented a medical notice ensuring that I could perform my job without restrictions. Later that morning I was sent home, partially because of my hairstyle (dreadlocks) of which I was questioned and criticized by Robinson and Cassandra Williams, but mainly because I informed the employer that I was pregnant.</p> <p>On August 1, 2017, I reported to training with Tonya (last name unknown) in the administrative building. Shortly thereafter I was summoned to the office and picked up by Maurice. Upon our arrival to the office I was confronted by Robinson in a hostile and aggressive manner about my conversation of feeling discriminated against with the trainer.</p> <p>Further on August 1, 2017, I requested to file a formal complaint through Supervisor Maurice for the discriminatory treatment. After providing him with a written statement as requested, I was told I would have to file through Human Resources in Birmingham AL. I asked Supervisor Maurice if I go to file a complaint will I be allowed to return to work. He would not give me an answer without making a call, then he confirmed I could leave and return.</p>			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures. I declare under penalty of perjury that the above is true and correct.		NOTARY - When necessary for State and Local Agency Requirements I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT _____ AUG 3 2017 SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year) U.S. EEOC Birmingham District Office	
Date Aug 03, 2017		Charging Party Signature 	

EEOC Form 5 (11/09)

<p align="center">CHARGE OF DISCRIMINATION</p> <p><small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small></p>	<p>Charge Presented To: _____ Agency(ies) Charge No(s): _____</p> <p><input type="checkbox"/> FEPA</p> <p><input checked="" type="checkbox"/> EEOC 846-2017-32787</p>
<p align="center">_____ and EEOC</p> <p align="center"><small>State or local Agency, if any</small></p>	
<p>Later, August 1, 2017, I filed a complaint to District Manager Dr. Ray Cureton, in the presence of Nicole Scavello, to no avail. Cureton immediately asked me whether I said I was going to sue the company. He then listened to my complaint and responded to my allegations regarding pregnancy, that Ms. Robinson is not like that. Scavello commented that what I was complaining of was not discrimination and that she has been racially harassed before. Cureton finished by stating they said this was not why but that they don't want me to come back. He advised, "I'm just a fat White man and I don't know what you all go through."</p> <p>I believe that I was discriminated against based on my race, sex (pregnancy) and retaliation in violation of Title VII of the Civil Rights Act of 1964, as amended.</p>	

<p>I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.</p>	<p>NOTARY - When necessary for State and Local Agency Requirements</p>
<p>I declare under penalty of perjury that the above is true and correct.</p>	<p>I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.</p>
<p><u>Aug 03, 2017</u> <u></u></p> <p>Date Charging Party Signature</p>	<p>SIGNATURE OF COMPLAINANT _____</p> <p>SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE <u>Aug 3 2017</u></p> <p align="center">U.S. EEOC Birmingham District Office</p>